

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Michael G. Gerfin, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I have been a Special Agent (SA) with the Federal Bureau of Investigation (“FBI”) since approximately August 2008. During this time, I have been assigned to numerous investigations involving violations of federal law, to include violations of Cyber Stalking and Interstate Communication of Threats. I am currently assigned to the FBI Cleveland Division Cyber Crime Squad and am responsible for investigations involving computer-related offenses. In addition to my work experience, I have received extensive specialized training in the field of computer crime investigation from the FBI and others. In addition to my investigative experience, I possess degrees in Computer Science and Physics and have been involved in the field of information technology for over 25 years. My previous employment consisted of roles in computer network administration and software engineering, and I hold numerous professional certifications in the field of computer security.

2. This investigation pertains to ongoing harassment and threats communicated over email, voicemail, and telephone to multiple victims residing within the Northern District of Ohio.

3. This affidavit is intended to show only that there is sufficient probable cause for the requested Complaint and Arrest Warrant and does not set forth all my knowledge about this matter.

PERTINENT FEDERAL CRIMINAL STATUTES

4. Title 18, U.S.C. § 2261A(2) (Cyberstalking); and Title 18, U.S.C. § 875(d) (Interstate Communications with Intent to Extort).

PROBABLE CAUSE

5. Over an approximately two-year period, a series of harassing communications have been received by multiple victims within the Northern District of Ohio. The context of messages and repeated references to events involving identified victims suggest these communications are related and sent by the same individual or individuals. Over time, communications, primarily via email, have contained more aggressive language, rhetoric, and tone.

6. Investigation has revealed primary subjects **AKIL LARRY JOSEPH** and **ALEXA MARIE LOGAN** as the sender(s) of such messages.

7. This affidavit refers to the following individuals, all of whose names and identities are known to law enforcement:

- a. PERSON 1
- b. PERSON 2 is a judge of the Summit County, Ohio, Court of Common Pleas and the ex-wife of PERSON 1
- c. PERSON 3 is a supervisory Special Agent in the Cleveland Field Office of the FBI.
- d. PERSON 4 is a son of PERSON 1 and PERSON 2.
- e. PERSON 5 is a former supervisory Special Agent in the Cleveland Field Office of the FBI, now retired.
- f. PERSON 6 is an elected official of Summit County, Ohio.
- g. PERSON 7 is the Chief of a police department in Summit County, Ohio.
- h. PERSON 8 is a detective employed by a police department in Summit County, Ohio.

i. PERSON 9 is a brother of PERSON 1.

8. On or about August 13, 2020, PERSON 1 met with personnel from the Federal Bureau of Investigation (FBI) Akron Resident Agency to report related extortion attempts and harassing communications received after a consensual relationship with LOGAN. PERSON 1 met LOGAN via an online dating site in 2018, and he stated they had a single sexual encounter. In April 2019, LOGAN stated to PERSON 1 that she was pregnant, and he was the father, ultimately demanding \$20,000 from PERSON 1 for the support of the alleged child.

9. After the initial report by PERSON 1, in-person and telephonic interviews of several parties involved were conducted. This ultimately resulted in multiple federal, state, and local government personnel, along with multiple third parties, receiving harassing communications, which became more graphic and explicit in nature over time. At times, group email messages have been received by the various harassment victims on a weekly or daily basis.

10. On or about April 17, 2020, legal representatives of PERSON 1 sent a Cease-and-Desist letter to LOGAN at adorablemoi12@yahoo.com. LOGAN was instructed to direct any further communications for PERSON 1 to the listed legal contacts.

11. On or about January 26, 2022, a Cease-and-Desist letter was sent to Alexa Logan from the FBI Cleveland Division Office of the Division Counsel. The letter was sent via standard mail and to the following email addresses: adorablemoi12@yahoo.com, alexalogan12@outlook.com, and akillarry@hotmail.com. A subsequent email from adorablemoi12@yahoo.com acknowledge receipt of this letter.

12. Harassing messages continued regularly throughout 2021 and into 2022. Numerous emails included recipients residing in the Northern District of Ohio on both the TO

line of the email and the CC line. Direct references to these individuals within the bodies of the emails were often made.

13. A series of group email messages received in late January and early February 2022 detailed specific allegations suggesting that government personnel and others were personally responsible for the alleged recent stillbirth death of LOGAN'S infant daughter. In various email messages sent from address **akillarry@hotmail.com**, identified as belonging to **AKIL LARRY JOSEPH**, the writer identified himself as the father of the deceased infant and described LOGAN as the mother. At least one message sent to government personnel and others residing in the Northern District of Ohio included images of what appeared to be a deceased infant.

14. On or about January 27, 2022, the user(s) of email address **akillarry@hotmail.com** sent an email to multiple individuals residing in the Northern District of Ohio, including PERSON 1 and PERSON 3, which stated in part:

Update! my daughter just died in the womb at under 30 weeks. Think of what it's like to deliver a stillborn. Stress which caused heart complication. Proven stress not alleged. Remember this day before you try to say something completely f--king ignorant you might want to think. Like use your pea size brain in your skull instead of your mouth because now you have a problem. If Alexa dies as devastated as she is right now your problems will only get bigger. I'm not some soft punk kid from Akron like [PERSON 2]'s son who makes threats but never even mowed the lawn or mastered the basics to be a man.

15. On or about February 2, 2022, the user(s) of email address **akillarry@hotmail.com** sent another email multiple individuals residing in the Northern District of Ohio, including PERSON 1 and PERSON 3, which stated in part:

[...]
When I do what needs to be done and I will for them for trying to harm the mother of my children and illegally entering my home when my wife

is grieving a loss. I'll bring the bodies and start stacking them in front of the Akron FBI, [PERSON 2]'s Court of Common Plea, The Cleveland FBI, [the law firm representing PERSON 1], [PERSON 1's place of business]. I'll leave some outside of [PERSON 5]'s house, Director Wary's¹ House. [PERSON 1's attorney] I'll put a few on your wife's car and your drive way. With your ego you'll come outside first to run your mouth I'll count on that. As for Southwick² I'll just wait for him in his living room. The media will more than likely start reporting and running the story instead of being intimidated by you "putting charges" on reporters. The mistake that you continue to make is to think that your matter to me or you exist outside of the rule of law. Anyone else would have been in prison so let's continue the route. My duty is to my family and my family alone.

16. On or about March 16, 2022, it is believed **JOSEPH** used telephone number 786-765-9237 to telephonically contact the publicly accessible telephone number for the office of the FBI Cleveland Division. The telephone call to FBI Cleveland Division was recorded by an FBI switchboard operator. Caller ID showed that the call originated from 786-765-9237. Although **JOSEPH** did not identify himself by name, he did reveal his identity from the context of his statements to the FBI switchboard operator. A verbatim transcription of the recorded telephone conversation with the FBI employee switchboard operator and **JOSEPH** is as follows:

FBI employee switchboard operator: "Cleveland FBI."

JOSEPH: "Hi, I actually called just uh minute ago to talk to [PERSON 3], but he won't - he won't answer my call."

FBI employee switchboard operator: "Ok, um did you have any sort of complaint or something that you were trying to make, or wh(unintelligible)?"

¹ Christopher Wray is the Director of the FBI. Director Wray's name is frequently misspelled "Wary" in messages sent by JOSEPH and/or LOGAN.

² Messages sent by JOSEPH and/or LOGAN repeatedly reference "John Southwick" and appear to suggest he is an FBI employee. No such person is known to investigators.

JOSEPH: *“Uh yeah, tell him that he can hide and not answer the phone all he wants to, it doesn’t change the fact that my daughter’s still dead. And [PERSON 5] can pretend that he doesn’t know what his dirty ass agent’s been up to and that’s fine, because at the end of the day, he’s gonna have to face what he’s done. So him, make sure you write this down, [FBI employee switchboard operator], don’t miss anything...him,[PERSON 3], [PERSON 2], [PERSON 4], [PERSON 9], [PERSON 1], [PERSON 1’s attorney], and John Southwick can all continue to pretend that nothin’s gonna happen, because had my wife not had to fight the person or people they sent here, to have her killed because she threatened to expose them, she wouldn’t of had to deliver a 27-week stillborn baby and hold it for 12 hours because the nurses refused to take it out of the hospital, but it’s ok, I understand you’re coming in on the tail end of this, and it may sound all crazy to you, but don’t worry the details are lined out. So tell [PERSON 3] he can keep hiding, but at some point he’s gonna have to face me. Can you give him that message?”*

FBI employee switchboard operator: *“Um are you making a threat, Sir?”*

JOSEPH: *“Dude does it sound (unintelligible) ok. First of all, just stop, ok, please stop. I just told you that my daughter’s dead and here you go with the typical FBI bulls--t. Does it sound like I really care what you think? Does it sound like I’ve made a threat? I told you to tell him he can keep hiding, but he’s gonna have to face what he’s done. What part of that did I make a threat? Did I threaten anybody with great bodily harm or imminent death? I did not, so ex - explain to me how tha - how can you construe that as a threat being made?”*

FBI employee switchboard operator: *“Sir, if there’s something I can help with, I will gladly transfer the phone call.”*

JOSEPH: *“No, just deliver the message for me and that would be great. That’s all.
Thank you. Appreciate it.”*

FBI employee switchboard operator: *“Ok, have a good night, Sir.”*

17. On or about March 17, 2022, the user(s) of email address

akillarry@hotmail.com sent an email to multiple individuals residing in the Northern District of Ohio, including PERSON 1’s attorney and PERSON 3, which stated:

[...]

When I called back the second time to tell her that you and [PERSON 5] can keep dodging calls and pretending that you don't know what's going on and that one day you'll have to face me and face what you've done, the next question from her was "Sir are you making threats?" Again more concerned with the threats that I clearly never made with her selective hearing than with the death of my daughter. I see why you guys suck so much at investigating cases. You lack the basic listening and comprehension skills. [PERSON 4] can make clear threats to kill and still walks around like he's a king. God bless his soul. Anything I say I own that's how I'm designed government entity or individual it's makes no difference to me. If I wanna say something I say it there is no corner to cut or guessing game to play. That's the difference between a man and a boy. At this point I'm sure [PERSON 2] knows what her son has been saying so (I didn't know) won't save her ignorant ass. Judge or no judge. Arrogance.

My daughter is still dead so everyday you wake up and clip that stupid badge on your belt and you holster your duty weapon which you are nothing without remember that. It's been a month going on two. Every time the anniversary of her death comes around I'll visit you in prison if you're brought up on charges and remind you that you're a murderer from behind the glass but my hope is that they let me on the recreation yard with you and send the other inmates inside so we can figure out what your problem is or they'll release you into general population from confinement so the other low lives know that a former FBI agent is in their presents but as [PERSON 4] put it in an email yesterday to Alexa the law works in the favor of rich people, who just happen to be white in this case so they'll put you on protective status more than likely. I hope that mouthy arrogant idiot is as tough in person as he is behind a phone and computer keyboard, god bless his soul again. [PERSON 2] should have showed him both side of life instead of raising him to only see one. Let him keep sending people here to do his dirty work and you can keep pretending that you don't know he's doing it. Remember my last email to you clowns? every time you do something dirty for [PERSON 2] like send people to kill Alexa even after my daughter's death, ask yourself this... How much blood do you have to spear? Remember this is Florida so I'll make sure the news gets a hold of it all. That's a courtesy. The others who come with the same intent, well I already told you what I'd do on my last email with your director cc on it. Man vs boy [PERSON 3] remember that. [PERSON 7] take notes to because your detective and you are just as responsible as he is for my daughters death. Next time someone comes to you, you'll use this as a learning experience to do your damn job.

18. On or about March 18, 2022, the user(s) of email address

akillarry@hotmail.com sent an email to multiple individuals residing in the Northern District of Ohio, including PERSON 1 and PERSON 3, which stated:

Imagine masked up just before 8pm in a hoodie and all black attempting to get into my house. When? Again when I'm not home. I have to laugh because who goes to someone's house to kill them and knocks on the door?. Jonny boy I love the fact that you [PERSON 4], his dad, and Southwick hack and track my electronics to see when I leave. One day I'm gonna throw you a hell of decoy and that will be your mistake. Don't just ask yourself how much blood you have to spare but ask [PERSON 4] and his "associates" Let daddy Wary know that you've use FBI tech to do dirty work but I'm sure he knows. Let's keep playing the game because I have nothing but time.

19. On or about March 24, 2022, the user(s) of email address

akillarry@hotmail.com sent an email to individuals residing in the Northern District of Ohio, including PERSON 3, which stated, in part:

[...]

Here is the thing and I want you to re read this multiple times. I'm not the person you want to play games with. Actually I'm a f--ked up enemy to have. It's that simple. My daughter is dead and that didn't have to be the case so if I were you I'd do the job of a chief and work like you work hard to earn the position that you have. When I spoke to you on the phone your words were "I assure you that there's no corruption." Remember that? I do because I re listen to the recording almost weekly.

[...]

20. On or about March 25, 2022, the user(s) of email address

akillarry@hotmail.com sent an email to multiple individuals residing in the Northern District of Ohio, including PERSON 1 and PERSON 3, which included:

36 weeks. That's how old my daughter would have been today in the womb, alive, well and healthy. That is had you all not orchestrated her murder and Richfield police did their jobs. A day doesn't go by where I don't think about what you pieces of s--t took from us. By the time I'm done my face is the last thing you'll see when you flush your toilets and turn to stare at your reflection in the water.

Don't worry nothing special going on here just a reminder that I'm not gonna stop until your jobs, pensions, hard work, saving, legacy and freedoms are taken from all of you. That's the best possible outcome. as my goal is to make it hard for you people to sleep at night. Don't worry I included director wary and the DOJ on the emails as usual. Again anything that I have to say I say. I'm not [PERSON 4] who has to hire hitmen to do his mothers dirty work while she still sits on a bench and sentence people to prison. Poor shame. Only in Ohio would something like this fly and you wonder why your state is at the bottom of the barrel. Right down there with Liberal New York and Communist California.
[...]

21. On or about March 28, 2022, the user(s) of email address

akillarry@hotmail.com sent an email to an employee of Summit County, Ohio, who works in the office of PERSON 6, which stated, in part:

[...]
My only advise to you is to watch your back now around these people because they will come after you and your family. It will either be fear, intimidation or money Same goes for your lead investigator and also [PERSON 6] because there are no limits to what they will do to make sure that they don't go to prison or go down alone. This is the reality of the situation so please familiarize yourself with your own security precautions because the police won't do it for you. When seconds count the police are minutes away. I went to a reporter in Florida to prove a point while we are on the same subject. They were ready to jump all over the story and release it. What they wanted to know is why the reporter at Akron Beacon Journal was go ready in the beginning to release the story and then in a matter of weeks she dropped off the map, stopped replying to Alexa's emails and her emails where she stated "there is definitely something going on here. Send me more info." turned into complete silence.
[...]

22. On or about April 6, 2022, the user(s) of email address **akillarry@hotmail.com** sent an email to individuals residing in the Northern District of Ohio, including PERSON 3 and PERSON 8, which stated:

No one expects any of you to answer. Calls and e-mails are just to prove a point at this stage in the game. [PERSON 7] you know why your

operations are so bad at lying? I'm going to assume it's because you never thought them how to. I love how conveniently you're not at your desk and you and [PERSON 8] are unavailable as if you're doing important police work on the other side of the damn galaxy. Calm down avenger.

I called and ask for [PERSON 8] and I get his voicemail. I called and asked to speak to you, she sent me back to [PERSON 8]'s extension. I called a third time to speak to big [PERSON 7] the original gangster cop and again your operator send me to [PERSON 8]'s voicemail right after telling instead of keep calling I can just leave a voicemail.

I can send people to your PD to talk to you if the need arises. It's not hard to do unless you plan on sleeping under your desk and not leaving work at all. I can have them meet you when you and [PERSON 2]'s boys have your little safety meetings to discuss "business" over coffee or golf. Let's talk business. Update on the investigation that we will pretend you're conducting. The one you assured me on the phone that you would look into. Remember the assurance of no corruption? I wonder what kinda dirt [PERSON 2] has on you? hmm. Must be something that makes you twerk with fear to the point where you forgot how to do your job. We can do this daily or weekly. Your choice but either way the respect that I had for you is down to about.

23. On or about April 18, 2022, the user(s) of email address **akillarry@hotmail.com** sent an email to multiple individuals residing in the Northern District of Ohio, including PERSON 1 and PERSON 3, which stated:

The game you keep playing will cost some if not all of you your lives one day. Like I said before I'm not [PERSON 4] I don't need to send anyone to do my dirty work. Yes I included the DOJ and director Wary because I say what needs to be said. Bold move knowing that I'm only feet away from my house but having someone go there to try to get to Alexa. Nice try though like I said before ask yourself how much blood you have to spare.

Funny you choose the time that the cameras are being worked on at my complex. That tells me everything I need to know. I personality don't give a damn about a lawsuit. You killed my daughter so it's prison at the end of the DOJ investigation or nothing at all. I shouldn't have to tell you what the alternative is.

24. On May 24, 2022, Microsoft Corporation provided responsive records for a Search Warrant previously served on April 5, 2022, for email account **akillarry@hotmail.com**. Information provided revealed numerous communications identifying the user of the account as **AKIL LARRY JOSEPH**.

25. Messages associated with the Correspondent **ALEXA LOGAN** were identified in the Inbox folder for account **akillarry@hotmail.com**. These included messages with correspondent email addresses of adorablemoi12@yahoo.com and AlexaLogan12@outlook.com, both of which are known through this investigation to be associated with LOGAN.

26. An email message identified in the Sent Items folder for account **akillarry@hotmail.com** dated April 22, 2019, sent from **akillarry@hotmail.com** to [\[REDACTED\]@realestateempire.com](mailto:[REDACTED]@realestateempire.com), contained a photograph of Florida Driver's Licenses for **ALEXA M. LOGAN** and **AKIL LARRY JOSEPH**. Identifiers on the photographed documents aligned with information from the State of Florida Department of Highway Safety and Motor Vehicles Driver and Vehicle Information Database. The message also contained screen captures of bank balance amounts and credit scores.

27. An email message identified in the Sent folder for account **akillarry@hotmail.com** dated April 22, 2019, sent from **akillarry@hotmail.com** to [\[REDACTED\]@realestateempire.com](mailto:[REDACTED]@realestateempire.com), contained an image of a document titled State of Florida Department of Corrections Employee Earnings Statement. The document contained the name **AKIL L JOSEPH** along with an Id Number XXX-XX-4229, which aligns with the Social Security Account Number for **JOSEPH**. Several such documents were included in this email, covering multiple months of income.

28. An email message identified in the Sent Items folder for account **akillarry@hotmail.com** dated August 20, 2021, sent from **akillarry@hotmail.com** to [REDACTED]@mannyingco.com, contained the following text:

Hi [REDACTED] this is Akil I'm I'm not sure if you remember me but you helped me and Alexa my wife find a place back in 2019 and we're looking for some help again with searching for a property to rent. I'm not sure if you're still in real estate but we were looking for something in Homestead.

[...]

29. An email message identified in the Sent Items folder for account **akillarry@hotmail.com** dated August 23, 2021, sent from **akillarry@hotmail.com** to [REDACTED]@outlook.com with Subject: Rent Docs, contained multiple images of identification documents. The documents included active Florida Driver's Licenses for **ALEXA MARIE LOGAN** and **AKIL LARRY JOSEPH**, Social Security Administration Account Cards for **LOGAN** (XXX-XX-2008) and **JOSEPH** (XXX-XX-4229)³, Social Security Account Cards for their two children, along with bank statements displaying balance and transaction summaries.

30. An email message identified in the Sent Items folder for account **akillarry@hotmail.com** dated October 11, 2021, sent from **akillarry@hotmail.com** to [REDACTED]@gmail.com with Subject: Rental Application Completed, included an image of a document that contained the following text:

[...]

RESIDENTIAL HISTORY FOR LAST 3 YEARS:
Current Address 1020 N homestead bld
Move In Date 04/21 Rent \$ 0
Owner/Agent Chapman Partnership/ Sabrina case manager

³ Complete Social Security Account Numbers are being deliberately redacted.

Previous Address 2461 se 16th ter unit 203
Move In Date 06/01/2019 Move Out Date 04/01/2021 Rent \$ 1450
Owner/Agent Anthony
Reason for Leaving Eviction due to covid shutdown started making
payment to owner

31. The address in the above email, namely 2461 SE 16th TER UNIT 203 HOMESTEAD, FL, is identical to the address found in the State of Florida Department of Highway Safety and Motor Vehicle Records for **AKIL LARRY JOSEPH**. The license record issued on September 03, 2019 has an expiration date of August 09, 2027.

32. An email message identified in the Sent Items folder for account **akillarry@hotmail.com** dated December 13, 2021, with Subject: Job App, contained images of certificates and a diploma in the name of **AKIL JOSEPH**. These included a Basic Recruit Certificate from the State of Florida Commission on Criminal Justice Standards and Training, and Certificate of Completion from the Gainesville Job Corps Center Homeland Security and Protective Services Course with associated Diploma.

33. An email message identified in the Sent Items folder for account **akillarry@hotmail.com** dated January 17, 2022, with Subject: Letter of Resignation, contained contact information for **AKIL JOSEPH** that included telephone number 786-765-9237, a number known to be subscribed to and utilized by **AKIL LARRY JOSEPH**.

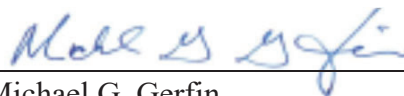
34. An email message identified in the Sent Items folder for account **akillarry@hotmail.com** dated April 1, 2022, with Subject: Lease for Alexa Logan, contained the text "Lease as proof of residency" along with an attached PDF document. The attached PDF detailed a residential lease for period beginning November 1, 2021 through October 31, 2022

with listed tenants **AKIL LARRY JOSEPH** and ALEXA MARIE LOGAN. The document included tenant telephone number of 786-765-9237.

CONCLUSION

35. Based on the foregoing, I believe that there is probable cause to show that **AKIL LARRY JOSEPH** has committed violations of Title 18, U.S.C. § 2261A(2) (Cyberstalking); and Title 18, U.S.C. § 875(d) (Interstate Communications with Intent to Extort).

Respectfully submitted,



Michael G. Gerfin
Special Agent
Federal Bureau of Investigation

SUBSCRIBED AND SWORN TO ME THIS 7th DAY OF JULY, 2022 VIA TELEPHONE AFTER SUBMISSION BY RELIABLE ELECTRONIC MEANS. FED. R. CRIM. P. 4.1 AND 41(d)(3).



AMANDA M. KNAPP
UNITED STATES MAGISTRATE JUDGE